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Department of Energy

Richland Operations Office P.O. Box 550 Richland, Washington 99352

MAY 1 0 1989

Mr. Roger Stanley, Project Manager State of Washington Department of Ecology Mail Stop PV-11 Olympia, Washington 98504-8711



Dear Mr. Stanley:

RESULTS OF SPECIFIC CONDUCTANCE ANALYSIS OF GROUNDWATER -- 1324-N SURFACE IMPOUNDMENT/1324-NA PERCOLATION POND (TSD NO. T-1-2)

The 1324-N/NA Surface Impoundment and Percolation Ponds are hazardous waste disposal facilities under Resource Conservation and Recovery Act interim status, and are subject to requirements found in Title 40 Code of Federal Regulations (CFR) 265, Subparts F through R. These regulations require that the groundwater be sampled and analyzed for specific constituents in up-gradient and down-gradient wells. The required quarterly sampling began in December 1987. Sampling results from the first year established baseline data and subsequent sampling results are used to determine if the waste site is affecting the groundwater.

The data from the wells surrounding 1324-N/NA have been analyzed using the statistical analyses required by 40 CFR 265.93 (b). The results of these analyses indicate that the specific conductance in all of the down-gradient wells is statistically different from background conductance values (significance level = 0.01). The average conductance at the down-gradient wells (199-N-58, 199-N-59, 199-N-60, and 199-N-61) are between 1300 and 1500 micromhos per centimeter, compared to facility background values averaging just under 200 micromhos per centimeter for the period.

Specific conductance is one of the indicator parameters of groundwater contamination listed in 40 CFR 265 subpart F. When the specific conductance of a down-gradient well is determined to be statistically different from the average background value, the following actions are required by the regulations:

...the owner or operator must provide written notice to the Regional Administrator 1 ... that the facility may be affecting ground-water quality. [40 CFR 265.93(d)(1)]

^{1&}quot;Regional administrator" shall mean the "department", where "department"
means the Washington Department of Ecology. [WAC 173-303-400(3)(b)(i)]

Within 15 days after the notification under paragraph (d)(1) of this section, the owner or operator must develop and submit to the Regional Administrator a specific plan... for a ground-water quality assessment program at the facility. [40 CFR 265.93(d)(2)]

This letter is intended to satisfy the first requirement; an assessment monitoring plan is being developed to fulfill the second requirement. If you have questions, please contact Mr. G. M. Bell of my staff at (509) 376-0680 or Mr. K. R. Fecht of the Westinghouse Hanford Company at (509) 376-0940.

Sincerely,

R. A. Holten, Director

Safety and Environment Division

SED:GMB

cc: R. D. Izatt, DOE

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Incoming

R. A. Holten, Director

Safety and Environment Division

U.S. Department of Energy

Richland Operations Office

Subject

Results of Specific Conductance Analysis of Groundwater -- 1324-N Surface

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